REMARKS/ARGUMENTS

Claims 1-33 are pending in the present application. The Examiner has rejected claims 1-33. Applicant respectfully requests reconsideration of pending claims 1-33.

The Examiner has rejected claims 23, 24, 32, and 33 under 35 U.S.C. § 112, second paragraph, a being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. In the Examiner's Response to Arguments, the Examiner states, "As recited, this claim language implies that there is an already selected virtual connection and that this step of the claim is now selecting the already "selected virtual connection." Applicant respectfully disagrees, but, in the interest of advancing the prosecution of the present application, Applicant amends claim 23. Applicant notes that the amendment is merely cosmetic, as Applicant has rewritten the claim in accordance with the Examiner's specific recommendation, which the Examiner states "would overcome the rejection and better clarify this step of the invention," although, in accordance with Applicant's previously presented arguments, Applicant submits that the originally filed claim 23 was equally clear as to Applicant's intended meaning. As to claim 24, the Examiner states that claim 24 is rejected because it depends on claim 23. As Applicant has amended claim 23 in accordance with the Examiner's specific recommendation, Applicant submits that the rejection of claim 24 is also obviated. Thus, Applicant submits that claims 23 and 24 are in condition for allowance.

Regarding claims 32 and 33, in the Examiner's Response to Arguments, the Examiner states, "the Applicant...draws on similar arguments as those stated above regarding the rejection of claims 23 and 24. The Examiner respectfully disagrees for the same reasons discussed above. The claim language again seems to imply previous selection steps that are not supported in any of the claims." Applicant respectfully disagrees. Firstly, Applicant submits that the Examiner's previous rejection of claims 32 and 33 differed from the Examiner's previous rejection of claims 23 and 24 and that Applicant's previously presented arguments differed with respect to claims 23 and 24 and to claims 32 and 33. Secondly, in Applicant's response, Applicant submits that Applicant offered a detailed explanation of why, grammatically, the Examiner's rejection is improper, yet the Examiner has mischaracterized Applicant's response. Thirdly, Applicant submits that Applicant's wording of claim 32 preserves antecedent basis from claim 31, from which claim 32 depends. Moreover, Applicant amends claim 32 to correct a one-letter typographical error that Applicant submits does not materially affect the meaning of claim 32. Thus, Applicant submits that such amendment is merely cosmetic. As

to claim 33, the Examiner states that claim 33 is rejected because it depends on claim 32. As Applicant presents argument for the allowability of claim 32, Applicant submits that the rejection of claim 33 is also obviated. Therefore, Applicant submits that claims 32 and 33 are in condition for allowance.

The Examiner has rejected claims 1, 2, 6, 7, 17, 22, 23, and 25 under 35 U.S.C. § 102(e) as being anticipated by Puntambekar et al. (U.S. Patent No. 6,097,726). Applicant respectfully disagrees. Applicant submits that, in the Examiner's Response to Arguments, the Examiner has misrepresented the teachings of Puntambekar et al. For example, the Examiner states, "As pointed out by the reference in column 5 lines 48-56, although the cards are being called 'ingress' and 'egress', the actual direction of the signal is irrelevant and so 'ingress' cards can also be considered 'egress' cards and vice versa since these terms delineate direction of traffic flow and traffic flows in both directions." In fact, column 5, lines 48-56, state as follows: "'Egress' means the Cell card that sends data cells upstream on the trunk, and 'ingress' means the Cell card that receives data cells sent by an egress Cell card. Note that this definition refers only to the direction of DATA flow for a particular MPT. The direction of signalling is irrelevant, as is the fact that a Cell card of one type with respect to a given MPT can also be a Cell card of the other type with respect to another MPT." Thus, the Examiner's assertions that "the actual direction of the signal is irrelevant" and "Thus each card is both an 'ingress' and 'egress' card" are inconsistent with the teachings of Puntambekar et al. with respect to a "MPT." Moreover, even if one were to assume that the Examiner's assertions were true (which Applicant disputes), Applicant submits that Puntambekar et al. still would appear to teach away from the present invention. For example, with regard to claim 1, Applicant submits Puntambekar et al. would still appear to teach away from "...wherein the ingress line card forwards at least a portion of the cell over the switching fabric to at least one of the plurality of egress line cards based on the forwarding decision." As another example, with regard to claim 17, Applicant submits that Puntambekar et al. would still appear to teach away from "receiving a cell over an ingress connection, wherein the cell includes an ingress connection identifier" and "...routing the cell through the multi-protocol switch based on the ingress connection identifier."

Moreover, Applicant reiterates Applicant's previously presented argument, for which the Examiner, in the Examiner's Response to Arguments, gives no evidence of having considered, that, rather than teaching "a plurality of egress line cards..." and "an ingress line card..." "...wherein the ingress line card forwards at least a portion of the cell over the switching fabric to at least one of the

plurality of egress line cards based on the forwarding decision," Puntambekar et al. states in col. 3, lines 9-11, "...multipoint-to-point (MPT) traffic destined for a switch is merged to a single virtual path...."

Thus, Applicant submits that Puntambekar et al. fail to anticipate the present invention, as recited in claims 1, 2, 6, 7, 17, 22, 23, and 25. Therefore, Applicant submits that claims 1, 2, 6, 7, 17, 22, 23, and 25 are in condition for allowance.

The Examiner has rejected claims 3-5 under 35 U.S.C. § 103(a) as being unpatentable over Puntambekar et al. in view of Honda et al. (U.S. Patent No. 6,147,999). Applicant respectfully disagrees. Applicant reiterates Applicant's previously submitted arguments. As noted above, Applicant submits that Puntambekar et al. teach away from the present invention as set forth in claim 1, from which claims 3-5 depend. Thus, Applicant submits that Puntambekar et al. further teach away from any attempt to combine the teachings of Puntambekar et al. and Honda et al.

While the Examiner cites col. 1, lines 35-45 of Honda et al., Applicant notes that Honda et al. state, in col. 1, line 36, "...in the ATM router..." as the context for "reassembling" and "segmenting." Honda et al. then state, in col. 1, lines 43-45, "...two kinds of facilities, ATM routers and ATM switches, are required for constructing an ATM network." Thus, Applicant submits Honda et al. appear to describe "reassembling" and "segmenting" specifically in the context of "the ATM router," which Honda et al. appear to distinguish from "ATM switches." Thus, Applicant submits that there is no suggestion to combine the teachings of Honda et al. disclosed specifically in the context of "the ATM router" with the teachings of Puntambekar et al. so as to allegedly suggest the "multi-protocol switch" as set forth in claims 3-5.

Furthermore, the Examiner states that Puntambekar et al. do not disclose that the ingress line card segments the reassembled packet to produce segmented cells. Therefore, Applicant submits that neither Puntambekar et al. nor Honda et al., either alone or in any attempted combination, teach or suggest the present invention, as set forth in claims 3-5. Consequently, Applicant submits that claims 3-5 are in condition for allowance.

The Examiner has rejected claims 8-12, 18, 19, 24, 26, and 31-33 under 35 U.S.C. § 103(a) as being unpatentable over Puntambekar et al. in view of Zheng et al. (U.S. Patent No. 6,611,522). Applicant respectfully disagrees. Applicant reiterates Applicant's previously submitted arguments. As noted above, Applicant submits that Puntambekar et al. teach away from the present invention as set

forth in claim 1, from which claims 8-12 depend, and claim 17, from which claims 18, 19, 24, and 26 depend. Thus, Applicant submits that Puntambekar et al. further teach away from any attempt to combine the teachings of Puntambekar et al. and Zheng et al. Therefore, Applicant submits that neither Puntambekar et al. nor Zheng et al., either alone or in any attempted combination, teach or suggest the present invention, as set forth in claims 8-12, 18, 19, 24, 26, and 31-33. Consequently, Applicant submits that claims 8-12, 18, 19, 24, 26, and 31-33 are in condition for allowance.

The Examiner has rejected claims 13-16 and 27 under 35 U.S.C. § 103(a) as being unpatentable over Puntambekar et al. in view of Smith et al. (U.S. Patent No. 6,128,649). Applicant respectfully disagrees. Applicant reiterates Applicant's previously presented arguments. As noted above, Applicant submits that Puntambekar et al. teach away from the present invention as set forth in claim 1, from which claims 13-16 depend, and claim 17, from which claim 27 depends. Thus, Applicant submits that Puntambekar et al. further teach away from any attempt to combine the teachings of Puntambekar et al. and Smith et al. Furthermore, Applicant notes that the Examiner states that Puntambekar et al. do not disclose that the switch operates using a multicasting protocol. Therefore, Applicant submits that neither Puntambekar et al. nor Smith et al., either alone or in any attempted combination, teach or suggest the present invention, as set forth in claims 13-16 and 27. Consequently, Applicant submits that claims 13-16 and 27 are in condition for allowance.

The Examiner has rejected claims 20, 28, and 29 under 35 U.S.C. § 103(a) as being unpatentable over Puntambekar et al. in view of Honda et al. and further in view of Zheng et al. Applicant respectfully disagrees. Applicant reiterates Applicant's previously presented arguments. As noted above, Applicant submits that Puntambekar et al. teach away from the present invention as set forth in claim 17, from which claim 20 depends. Thus, Applicant submits that Puntambekar et al. further teach away from any attempt to combine the teachings of Puntambekar et al., Honda et al., and Zheng et al. Also, as noted above with respect to Honda et al., Applicant submits that there is no suggestion to combine the teachings of Honda et al. disclosed specifically in the context of "the ATM router" with the teachings of Puntambekar et al. so as to allegedly suggest the "multi-protocol switch" as set forth in claims 28 and 29 or the "method for routing cell traffic using a multi-protocol switch" as set forth in claim 20. Furthermore, Applicant notes that the Examiner states that Puntambekar et al. do not disclose segmenting the reassembled packet to produce segmentation cells and forwarding segmentation cells. Therefore, Applicant submits that none of Puntambekar et al., Honda et al., or Zheng et al., either alone or in any attempted combination, teach or suggest the present invention, as

set forth in claim 20. Furthermore, the Examiner states that Puntambekar et al. do not disclose that the ingress line card segments the reassembled packet to produce segmented cells. Therefore, Applicant submits that none of Puntambekar et al., Honda et al., or Zheng et al., either alone or in any attempted combination, teach or suggest the present invention, as set forth in claims 20, 28, and 29. Consequently, Applicant submits that claims 20, 28, and 29 are in condition for allowance.

The Examiner has rejected claims 21 and 30 under 35 U.S.C. § 103(a) as being unpatentable over Puntambekar et al. in view of Honda et al. and Zheng et al. and further in view of Yang et al. (U.S. Patent No. 5,917,819). Applicant respectfully disagrees. Applicant reiterates Applicant's previously presented arguments. Applicant notes that the cited portion of Yang et al. states, "...the appropriate VPI/VCI destination address is retrieved from the output translation table 16 as illustrated in step 86 using the local CID as an index prior to transmission of the cell as illustrated in step 88." Thus, rather than teaching "determining an egress index for the reassembled packet based on the destination address," Yang et al. appear to teach away from such feature by appearing to teach "using the local CID as an index" to retrieve "the appropriate VPI/VCI destination address." Furthermore, Applicant notes that the Examiner states that Puntambekar et al. do not disclose determining an egress index for the reassembled packet based on the destination address and using the egress index to forward at least a portion of the reassembled packet to at least one egress connection. Also, with respect to claim 30, as noted above with respect to Honda et al., Applicant submits that there is no suggestion to combine the teachings of Honda et al. disclosed specifically in the context of "the ATM router" with the teachings of Puntambekar et al. so as to allegedly suggest the "multi-protocol switch" as set forth in claim 30. Therefore, Applicant submits that none of Puntambekar et al., Zheng et al., or Yang et al., either alone or in any attempted combination, teach or suggest the present invention, as set forth in claims 21 and 30. Consequently, Applicant submits that claims 21 and 30 are in condition for allowance.

In conclusion, Applicant has overcome all of the Office's rejections, and early notice of allowance to this effect is earnestly solicited. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney.

Respectfully submitted,

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